

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

VIRTAMOVE, CORP.,	§	Case No. 2:24-cv-00093-JRG
	§	(Lead Case)
Plaintiff,	§	
	§	
v.	§	<b>JURY TRIAL DEMANDED</b>
	§	
HEWLETT PACKARD ENTERPRISE	§	
COMPANY,	§	
	§	
Defendant.	§	

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VIRTAMOVE, CORP.,	§	Case No. 2:24-cv-00064-JRG
	§	(Member Case)
Plaintiff,	§	
	§	
v.	§	<b>JURY TRIAL DEMANDED</b>
	§	
INTERNATIONAL BUSINESS	§	
MACHINES CORP.,	§	
	§	
Defendant.	§	

**DEFENDANT IBM’S UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE  
REPLY REGARDING MOTION TO TRANSFER (DKT. 78)**

Defendant International Business Machines Corp. (“IBM”) respectfully moves for a two and a half-week extension of time for IBM to files its reply in support of its Motion to Transfer Venue to the Northern District of California Pursuant to 28 U.S.C. § 1404(a) (Dkt. 78).

With a two and a half-week extension from September 30, 2024, the deadline for IBM to file its reply would be extended to October 16, 2024. This extension is not being sought for purpose of delay, but rather to ensure that IBM has adequate time to address the issues raised in Plaintiff’s Opposition to IBM’s Motion to Transfer (Dkt. 82) and receive new discovery Plaintiff has agreed to produce in connection with that Opposition.

Counsel for the parties have conferred and all parties stipulate to this extension.

Accordingly, IBM requests that the Court grant the motion and enter the attached proposed Order.

Dated: September 26, 2024

Respectfully submitted,

/s/ Kyle A. Calhoun

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*Attorneys for Defendant  
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**CERTIFICATE OF CONFERENCE**

The undersigned hereby certifies that counsel has complied with the meet and confer requirement in Local Rule CV-7(h) and that this is a joint motion.

/s/ Kyle A. Calhoun

Kyle A. Calhoun

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(a)(3) on September 26, 2024.

/s/ Kyle A. Calhoun

Kyle A. Calhoun